

**IN THE UNITED DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

UNITED STATES OF AMERICA)
Plaintiff,)
)
)
)
v.	Case No.: 2:19-cr-00013
)
GEORGIANNA A.M. GIAMPIETRO	Chief Judge Waverly D. Crenshaw, Jr.
Defendant.	Magistrate Judge Alistair E. Newbern

DEFENDANT'S MOTION FOR LEAVE TO FILE DECLARATION UNDER SEAL

The defendant, Georgianna Giampietro, through undersigned counsel, hereby moves for leave to file under seal a declaration from Maria Williams, the defendant's mother. This declaration is Exhibit D and in support of the defendant's Motion to Revoke the Detention Order and Release to Home Confinement (Dkt No. 151). The declaration contains the home address of the defendant and her mother, where the defendant is asking to be released, along with the names of her minor children. It is therefore of a sensitive nature and warrants filing under seal.

Wherefore, for the reasons above, the defendant moves for leave to file the above-described declaration, Exhibit D, with the Court under seal.

Respectfully submitted,

By: /s/ Charles Swift
Charles D. Swift,
Pro Hac Attorney for Giampietro
CLCMA
833 E. Arapaho Rd., Suite 102
Richardson, TX 75081
(972) 914-2507

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 27th day of October, 2020, I electronically filed the foregoing Motion for Leave to File Under Seal with the Clerk of the Court using the CM/ECF system which will send a notice of electronic filing to all counsel of record.

By: /s/ Charles Swift
Charles D. Swift, Pro Hac
Attorney for Giampietro
833 E. Arapaho Rd., Suite 102
Richardson, TX 75081